

IN THE CIRCUIT COURT OF MARYLAND FOR FREDERICK COUNTY

STATE OF MARYLAND

:

v.

:

Case No. C-10-CR-22-000666

CHELSEA ANN KADISH

:

CONSENT MOTION FOR COUNSEL TO APPEAR REMOTELY

COMES NOW the State of Maryland, by and through Kathryn Gravely, Appointed Special Prosecutor and Assistant State's Attorney for Anne Arundel County, Maryland, respectfully requests this Honorable Court to grant a remote appearance for the entry of a *nolle prosequi* on July 18, 2023, and in support thereof, states as follows:

1. This matter was recently removed from the Stet docket for an entry of a *nolle prosequi* scheduled for July 18, 2023 at 9:00am;
2. Undersigned Counsel for the State is an appointed Special Prosecutor from Anne Arundel County with a lengthy commute to Frederick County Circuit Court;
3. Undersigned Counsel for the State recently suffered a medical emergency where, while back to work, she is not permitted to drive and needs to make transportation arrangements for any in-person office and court appearances;
4. Undersigned Counsel for the State conferenced with Counsel for the Defense, Mr. David Harbin, Esq., who does not object to the State's request for a virtual appearance;
5. If granted, the State's email address for a virtual appearance is sagrav22@aacounty.org.

WHEREFORE, for the foregoing reasons, the State respectfully requests that Court grant permission for the State to appear virtually on July 18, 2023.

July 10, 2023
Date

/s/ Kathryn Gravely
Kathryn S. Gravely (#2006160011)
Assistant State's Attorney
Office of the State's Attorney for Anne Arundel County
8 Church Circle
Annapolis, MD 21401
Office: (410) 222-0370
sagrav22@aacounty.org

CERTIFICATE OF SERVICE

I hereby certify that a copy of this motion has been filed and served via MDEC on July 10, 2023 to all parties of record.

/s/ Kathryn Gravely

Kathryn S. Gravely (#2006160011)

Assistant State's Attorney

Office of the State's Attorney for Anne Arundel County

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